

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

UNITED STATES OF AMERICA)
)
)
vs.) CASE No. 3:14-00088
) JUDGE SHARP
TIMOTHY FLANAGAN)
Defendant)

MOTION FOR LEAVE TO FILE PLEADING UNDER SEAL

Comes now the defendant, Timothy Flanagan, by and through counsel of record, David R. Heroux, and respectfully moves this Honorable Court for permission to file a pleading under seal.

Respectfully submitted,

Haymaker & Heroux, P.C.

S/: David R Heroux
David R. Heroux, B.P.R. #20798
Attorney for the Defendant
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing "MOTION FOR LEAVE TO FILE PLEADING UNDER SEAL" has been provided to:

Mr. Harold Benton McDonough , Jr.
Assistant United States Attorney
110 Ninth Avenue South, Suite A961
Nashville, Tennessee 37203-3870

Jared Fishman
Department of Justice
Civil Rights Division/Criminal Section
601 D Street, N.W.
5th Floor
Washington, DC 20004

This the 12th day of February, 2015.

S/: David R. Heroux
David R. Heroux